

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

**IN RE:**

**Jack T. Mann**

**Debtor(s)**

**Case No.: 08 B 19517**

**Chapter: 7**

**Hearing Date: January 9, 2009**

**Judge Bruce W. Black (Joliet)**

**NOTICE OF MOTION**

TO: Michael G. Berland, Trustee, 1 N. LaSalle St., #1775, Chicago, IL 60602 by electronic notice through ECF  
William T. Neary, Office of the U. S. Trustee, 219 S. Dearborn Street, #873, Chicago, IL 60604 by electronic notice through ECF  
Jack T. Mann, Debtor, 3120 Twilight Avenue, Naperville, IL 60564  
Peter Muldoon, Attorney for Debtor, 340 Houston Street #C, Batavia, IL 60510 – by electronic notice through ECF

PLEASE TAKE NOTICE that on the January 9, 2009, at 9:15 am, or as soon thereafter as counsel may be heard, I shall appear before the honorable Judge Bruce W. Black, Bankruptcy Judge, in the courtroom usually occupied by him/her at the Will County Court Annex Building 57 North Ottawa Street, Joliet, Illinois 60432, Room 201, or before any other Bankruptcy Judge who may be sitting in his/her place and stead, and shall then and there present this Motion for Discharge of the undersigned, a copy of which is attached hereto and herewith served upon you, and shall pray for the entry of an Order in Compliance therewith, at which time you may appear if you so desire.

By: /s/ Nathaniel J. Pomrenze  
NATHANIEL J. POMRENZE

Richard H. Fimoff & Nathaniel J. Pomrenze  
Robbins, Salomon & Patt, Ltd.  
25 E. Washington Street  
Suite 1000  
Chicago, Illinois 60602  
(312) 782-9000

FINAL DRAFT  
12/18/08

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice along with the attached Motion for Discharge, upon the parties listed below, as to the Trustee and Debtor's attorney via electronic notice on December 18, 2008 and as to the debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 25 East Washington Street, Chicago, Illinois 60602 before the hour of 5:00 PM on December 18, 2008.

TO: Michael G. Berland, Trustee, 1 N. LaSalle St., #1775, Chicago, IL 60602 by electronic notice through ECF  
William T. Neary, Office of the U. S. Trustee, 219 S. Dearborn Street, #873, Chicago, IL 60604 by electronic notice through ECF  
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**MOTION FOR DISCHARGE**

NOW COMES Jack T. Mann, the Debtor in the above-captioned case, by and through his attorneys, Robbins, Salomon & Patt, Ltd., and for his Motion for Discharge, hereby states as follows:

1. The Debtor filed his Chapter 7 Petition commencing this case on July 29, 2008.
2. The deadline for the filing of complaints objecting to discharge of the Debtor was November 10, 2008.
3. There have been no complaints objecting to the discharge of the Debtor filed in this case.
4. An Initial Report of Assets was filed by the Trustee on November 3, 2008.
5. There is no basis for denying the Debtor a discharge and the Debtor is entitled to a discharge in this case.

WHEREFORE, Robbins, Salomon & Patt, Ltd. prays that this Court enter an Order granting this Motion and granting the Debtor, Jack T. Mann, a bankruptcy discharge.

**ROBBINS, SALOMON & PATT, LTD.**

By: /s/ Nathaniel J. Pomrenze  
One of Its Attorneys

Richard h. Fimoff ARDC # 804866  
Nathaniel J. Pomrenze ARDC # 6187772  
ROBBINS, SALOMON & PATT, LTD.  
25 East Washington Street, Suite 1000  
Chicago, Illinois 60602  
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